

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:24-MJ-501
)	
CHRISTOPHER GEORGE SCHOENMANN,)	<u>UNDER SEAL</u>
)	
<i>Defendant.</i>)	
_____)	

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND AN ARREST WARRANT**

I, Richard Greene, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with Homeland Security Investigations (HSI) and have been so employed since November 2021. I am currently assigned to the HSI Office of the Special Agent in Charge, Washington, D.C. ("HSI DC"), Child Exploitation Group. I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the sexual exploitation of children, in violation of 18 U.S.C. § 2251, and the illegal distribution, receipt, transportation, possession, and access with intent to view of child pornography, in violation of 18 U.S.C. § 2252. I have received training in the area of child pornography and child exploitation, and I have had the opportunity to observe and review numerous examples of child pornography, as defined in 18 U.S.C. § 2256(8), including computer media. Through my experience and training, I can identify child pornography when I see it. I have training and experience in the enforcement of the laws of the United States, including the preparation, presentation, and service of subpoenas, affidavits, search warrants, and arrest warrants. As a federal agent, I am authorized to investigate violations of laws of the United States and, as a law

enforcement officer, I am authorized to execute warrants issued under the authority of the United States.

2. The statements contained in this affidavit are based in part on information provided by U.S. federal law enforcement agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents; information gathered from the service of administrative subpoenas; independent investigation and analysis by law enforcement agents/analysts and computer forensic professionals; and my experience, training, and background as a Special Agent. This affidavit contains information necessary to support probable cause for this application. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the criminal complaint, I have not included every detail known to the government. Rather, I have set forth only those facts that I believe are necessary to establish probable cause.

3. I submit this affidavit in support of a criminal complaint and arrest warrant charging Christopher George SCHOENMANN ("SCHOENMANN") with sexual exploitation of children, in violation of 18 U.S.C. § 2251(a) and (e). For the reasons set forth below, I submit that probable cause exists to believe that from on or about August 1, 2020, to on or about July 29, 2022, SCHOENMANN attempted to and did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, and such visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, and had actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

STATUTORY AUTHORITY AND DEFINITIONS

4. Title 18 U.S.C. § 2251(a) prohibits a person from employing, using, persuading, inducing, enticing, or coercing any minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct or for the purpose of transmitting a live visual depiction of such conduct, if such visual depiction was produced and transmitted using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, or had actually been transported and transmitted using any means and facility of interstate and foreign commerce or in and affecting interstate and foreign commerce.

5. The term “minor,” as defined in 18 U.S.C. § 2256(1), means any person under the age of 18 years.

6. The term “sexually explicit conduct,” as defined in 18 U.S.C. § 2256(2)(A)(i)–(v), means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person.

7. The term “visual depiction,” as defined in 18 U.S.C. § 2256(5), includes undeveloped film and videotape, data stored on computer disc or other electronic means which is capable of conversion into a visual image, and data that is capable of conversion into a visual image that has been transmitted by any means, whether or not stored in a permanent format.

SUMMARY OF PROBABLE CAUSE

8. As further described below, the investigation of SCHOENMANN began in 2023 after law enforcement searched the phone of another individual (“SUBJECT-1”) suspected of engaging in child exploitation offenses. Review of SUBJECT-1’s phone revealed chats with

SCHOENMANN wherein they discussed their sexual interest in minor children. In addition, the chats showed that SCHOENMANN had access to two minor children, whom SCHOENMANN had photographed engaging in sexually explicit conduct. The chats spanned approximately 3-years, during which time frame SCHOENMANN sent SUBJECT-1 numerous sexually explicit images and videos of minor children.

A. The state investigation of SUBJECT-1

9. In July 2022, the Lake City Police Department in Lake City, Minnesota received a CyberTipline Report from the National Center for Missing and Exploited Children regarding suspected distribution of child sexual abuse material (CSAM) on Kik, a social media and messaging platform. Further investigation revealed that the Kik user in the CyberTipline Report was SUBJECT-1. SUBJECT-1 was arrested in Minnesota and charged with sex offenses. His electronic devices were seized and searched pursuant to a state search warrant.

Chats between SUBJECT-1 and SCHOENMANN

10. In September 2022, a forensic review of SUBJECT-1's Samsung Galaxy S9 Plus cell phone revealed WhatsApp chats between SUBJECT-1 and another user, utilizing a phone number ending in 4826. Records obtained from Verizon Wireless revealed that the phone number ending in 4826 was registered to SCHOENMANN.

11. The chats spanned from July 24, 2019, to August 26, 2022, and included discussions about engaging in sex with their children. Further, they distributed CSAM to each other frequently, including CSAM depicting SUBJECT-1's child. For example, on March 9, 2022, they had the following WhatsApp exchange:

- SCHOENMANN: i took a new pic of my [redacted]'s pussy for you the other day :X
- SCHOENMANN: wanna see it?
- SUBJECT-1: Mmmm

- SUBJECT-1: Can't wait to see more of both of them
- SUBJECT-1: Definitely gotta get more of the oldest
- SUBJECT-1: Too
- SCHOENMANN: oh yeah, gonna try
- SCHOENMANN: wanna see it?
- SUBJECT-1: Thank you. Yes I do
- SCHOENMANN: i want to cum all over my at the thought of you looking at it
- SUBJECT-1: Mmmm
- SUBJECT-1: I cant wait to see it
- SCHOENMANN: [sent an image of a minor girl's exposed genitals]


12. Lake City Police determined that SCHOENMANN lived in Mount Pleasant, South Carolina. Consequently, the investigation of SCHOENMANN was turned over to Mount Pleasant Police Department, who, in April 2023, requested assistance from HSI Charleston-South Carolina.

B. Search of SCHOENMANN's residence and forensic examination of his devices

13. On April 28, 2023, HSI Charleston assisted South Carolina state law enforcement in the execution of a state search warrant for child-pornography-related evidence at SCHOENMANN's residence in Mount Pleasant, South Carolina. Law enforcement seized multiple electronic devices from SCHOENMANN's residence, including a Google Pixel cell phone (IMEI: 359668273328469). The phone number attached to the Google Pixel cell phone was same number (ending in 4826) used in the WhatsApp chats with SUBJECT-1. Additionally, the Google account associated with the Google Pixel cell phone had a display name of: Chris SCHOENMANN.

14. Forensic examination of the Google Pixel cell phone revealed multiple images and videos depicting minors engaged in sexually explicit conduct. The images and videos on the Google Pixel cell phone included sexually explicit depictions of SUBJECT-1's children saved from WhatsApp. The messages between SUBJECT-1 and SCHOENMANN had been deleted.

15. Review of the WhatsApp messages between SCHOENMANN and SUBJECT-1 on SUBJECT-1's cell phone revealed the following chat on March 17, 2022, regarding a minor girl, later identified as MV1¹:

SCHOENMANN	The little one will def see my jerk off and shower today
SCHOENMANN	
SUBJECT-1	Nice
SCHOENMANN	Oh yea
SUBJECT-1	Shoot that load on her
SCHOENMANN	Think I might right now
SUBJECT-1	Mmmm
SCHOENMANN	Wanna see
SCHOENMANN	Got more for you when I have time to enjoy with me hehe
SUBJECT-1	Yes I do
SUBJECT-1	I wanna see it all bro
SUBJECT-1	Sorry if im slow im setting tile today
SCHOENMANN	All good

16. SCHOENMANN then sent the following images to SUBJECT-1, which were also found on SCHOENMANN's Google Pixel cell phone:

¹ MV1 has a date of birth in 2020.

- IMG-20220317-WA004.jpg, which depicts MV1 lying on a blanket. MV1 is nude from the waist down and the focus of the image is MV1's genitals. The image also shows an adult man's erect penis hovering over MV1's genitals.
- IMG-20220317-WA0002.jpg, which depicts MV1 lying on a blanket, nude from the waist down. The focus of the image is MV1's genitals. What appears to be an adult man's hand is shown manipulating MV1's hip and legs to further expose her genitals.

17. One of MV1's parents was interviewed and confirmed that the above-described photos depicted MV1, who they estimated to be approximately 2 years old at the time the images were taken. Further, the parent of MV1 indicated that the photos were captured in Reston, Virginia, where SCHOENMANN and MV1 lived prior to Mount Pleasant, South Carolina.

18. Forensic examination of the Google Pixel cell phone also revealed sexually explicit images and videos depicting a little girl who was later identified as MV2.²

19. Review of the WhatsApp messages between SCHOENMANN and SUBJECT-1 on SUBJECT-1's cell phone also revealed an April 2022 WhatsApp chat regarding MV2. On April 21, 2022, SCHOENMANN messaged SUBJECT-1 that he was going to try and take some pictures of MV2 when she got out of the shower. The conversation continued the following day, as shown below:

SCHOENMANN	It's shower time to ight too and mommy is at the store
SCHOENMANN	Hopefully my oldest gets out the shower before wife gets home
SCHOENMANN	I'm already jerking off thinking about you seeing her again (SCHOENMANN sends two emojis of a sweating face)

² MV2 has a date of birth in 2013.

SCHOENMANN	Just gotta figure out how to get a pic
SUBJECT-1	Mmm I need to see her again so bad
SCHOENMANN	[SCHOENMANN sends sweating face emoji]
SUBJECT-1	I want your oldest so bad
SCHOENMANN	😊
SCHOENMANN	Im going to be jerking off all day
SCHOENMANN	omg
SUBJECT-1	Mmm did you get some pics
SCHOENMANN	;))
SUBJECT-1	I wanna see her again so bad
SCHOENMANN	[Sends nude image of MV2 but her genitals are not displayed]
SUBJECT-1	Omh fuck yes
SCHOENMANN	:)
SUBJECT-1	I want to fuck her bad
SCHOENMANN	so damn hard and leaking with you looking at her
SUBJECT-1	Would love to see her little buds and peach
SCHOENMANN	;))
SCHOENMANN	might have gotten one with both ;)
SUBJECT-1	Omg please
SCHOENMANN	;))
SUBJECT-1	I wanna see her so bad
SCHOENMANN	you ready

SUBJECT-1	Yes
SUBJECT-1	Very ready
SCHOENMANN	[Sends nude image of MV2 (see below for descriptions)]
SUBJECT-1	Oh god yes so perfect
SCHOENMANN	hehe
SCHOENMANN	Smooth and soft for your playing
SCHOENMANN	fuck so hard
SUBJECT-1	Looks so tasty
SUBJECT-1	Me too
SCHOENMANN	Like gonna cum all over my self haha
SUBJECT-1	She has the perfect body
SCHOENMANN	oh yeah
SUBJECT-1	Mmm yes
SUBJECT-1	I wanna cum inside her
SUBJECT-1	How old is she now
SCHOENMANN	8
SCHOENMANN	i have more ;)

20. During the above chat, SCHOENMANN sent the following images to SUBJECT-1, which were also found on SCHOENMANN's Google Pixel cell phone:

- IMG-20220422-WA0002.jpg, which depicts MV2 lying on a bed with what appears to be a towel or robe wrapped around her mid-section. The image is focused on MV2's genitals, which are visible in the image.

- IMG-20220422-WA0003.jpg, which depicts MV2 laying on a bed wearing the same towel or robe around her mid-section. The focus of the image is MV2's exposed genitals.

21. One of MV2's parents was interviewed and confirmed that the above-described photos depicted MV2, who they estimated to be approximately 8 years old at the time the images were taken. Further, the parent of MV2 indicated that the photos were captured in Reston, Virginia, where SCHOENMANN and MV2 lived prior to Mount Pleasant, South Carolina.

22. SCHOENMANN's Google Pixel cell phone was manufactured outside of the Commonwealth of Virginia.

CONCLUSION

23. Based on the foregoing, I submit that there is probable cause to believe from on or about August 1, 2020 to on or about July 29, 2022, Christopher George SCHOENMANN attempted to and did sexually exploit a child, in violation of 18 U.S.C. § 2251(a) and (e). Therefore, I respectfully request that a criminal complaint and arrest warrant be issued for SCHOENMANN.

Respectfully submitted,

**RICHARD A
GREENE**
Richard Greene, Special Agent
Homeland Security Investigations

Digitally signed by
RICHARD A GREENE
Date: 2024.12.18 07:25:34
-05'00'

Sworn and subscribed to in accordance with Fed. R. Crim. P. 4.1 by telephone on December 18, 2024:

William E. Fitzpatrick
The Honorable William E. Fitzpatrick
United States Magistrate Judge